

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

**FEDERAL RESERVE BANK OF SAN
FRANCISCO,**
Plaintiff

Civil No. 23-01034 (GMM)

v.

**OTO ANALYTICS, LLC; BENWORTH
CAPITAL PARTNERS PR, LLC;
BENWORTH CAPITAL PARTNERS, LLC;
BERNARDO NAVARRO and CLAUDIA
NAVARRO,**
Defendants

JOINT STATUS REPORT

Pursuant to this Court’s September 3, 2024 Order (ECF No. 161), Plaintiff Federal Reserve Bank of San Francisco (“Reserve Bank”) and Defendants Benworth Capital Partners PR, LLC, Benworth Capital Partners, LLC, Bernardo Navarro, and Claudia Navarro (collectively, “Defendants”; together with Plaintiffs, the “Parties”), through their undersigned counsel, respectfully submit this Joint Status Report.

Since the Parties’ July 7, 2025 *Joint Status Report* (ECF No. 275, the “July Status Report”), the Parties continue to meet and confer, including regarding outstanding discovery items discussed in the July Status Report and as described below:

- **Pending Motions.** There is one motion currently pending before this Court: the Reserve Bank’s *Motion to Compel Documents and Communications Over Which Defendants Have Improperly Asserted Accountant-Client Privilege* (ECF No. 250), which, after the filing of the *Joint Opposition to Plaintiff-Intervenor Federal Reserve Bank of San Francisco’s Motion to Compel Documents and Communications Over Which Defendants Improperly Assert Accountant-Client Privilege [DE 250]* (ECF No. 270), including two extension motions by the Defendants (ECF Nos. 263, 269), which were duly granted (ECF Nos. 264, 271), and *Plaintiff-Intervenor Federal Reserve Bank of San Francisco’s Reply to Defendants’ Joint Opposition to the Motion to Compel Documents and Communications Over Which Defendants Improperly Assert Accountant-Client Privilege* (ECF No. 274), is fully briefed.

- **Discovery Deadlines and Case Management Order.** The *Case Management Order* (ECF No. 161), as most recently amended following the Reserve Bank's motion filed on June 2, 2025 and this Court's order granting such motion (ECF Nos. 256, 257), required the Parties to complete document discovery, excluding depositions and document requests arising from Defendants' compliance with their obligation to produce QuickBooks data, by June 27, 2025. The Parties continue discuss the need for further amendment to the Case Management Order.
- **QuickBooks Data.** As more fully described in the July Status Report, Defendants still have not complied with the Court's May 21, 2025 order (ECF No. 245) to produce QuickBooks data. The Reserve Bank continues to have concerns regarding Defendants' ongoing failure to comply with the twice-extended deadline to produce, which the Parties continue to discuss.
- **Outstanding Document Requests.** The Parties continue to meet and confer to discuss outstanding discovery requests, as more fully described in the July Status Report.

Dated: August 6, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 6, 2025, the foregoing document was filed with the Clerk of the Court using CM/ECF, which sent notice to all parties receiving notifications through the CM/ECF system.

Dated: August 6, 2025

By: /s/ Aníbal A. Román Medina